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October 24, 2022

BY ELECTRONIC MAIL

The Honorable Jed S. Rakoff
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Jackson, et.al.*, 22 Cr. 352 (JSR)

Your Honor:

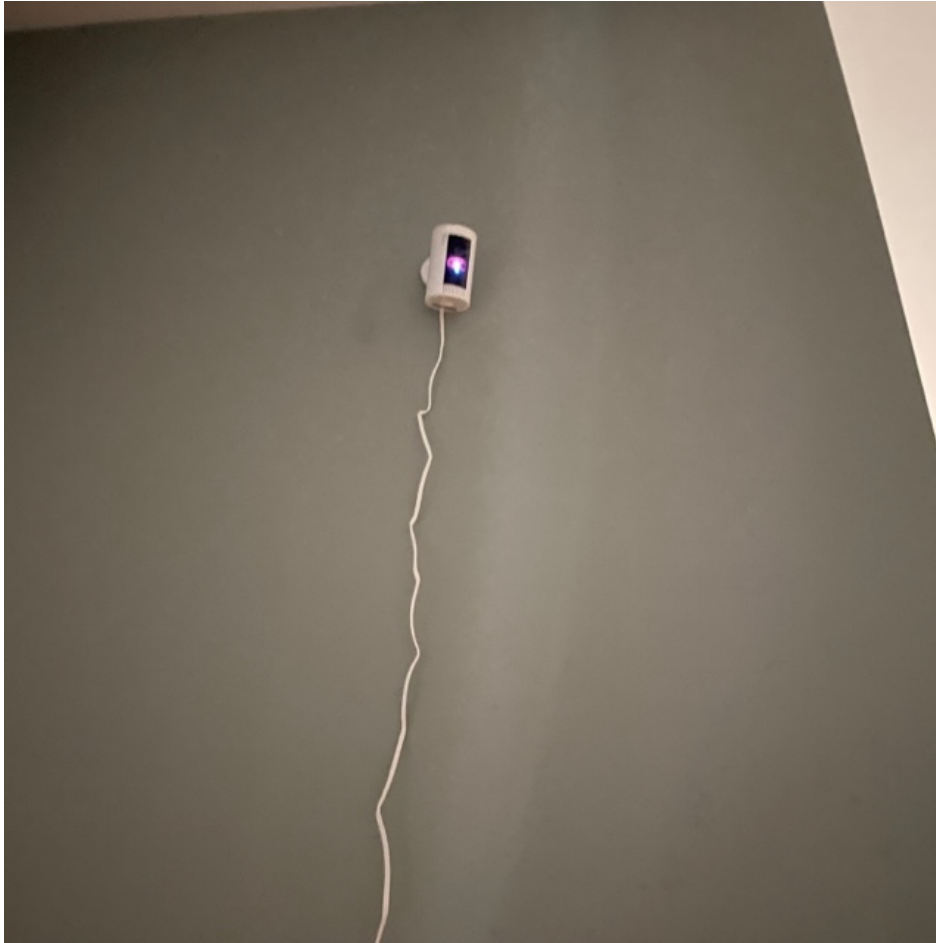
Counsel spent considerable time this weekend with Mr. Jackson's family, and specifically his girlfriend, Gwendolyn Hunter, attempting to arrive at a practical and effective way in which the Court could grant Mr. Jackson's request for bail, while ensuring the safety of the community.¹

In an effort to configure the same, I discussed the installation of video cameras into all of the rooms in Ms. Hunter's apartment except the bathroom. This would permit all activity in Ms. Hunter's apartment to be monitored 24/7, in order to ensure Mr. Jackson's compliance with whatever constraints the Court would place on his home confinement. While monitoring the cameras in real time might not be feasible, all of the video recordings would be made available to Pretrial Services and the U.S. Attorney's office, on a daily or weekly basis enabling them to be viewed in real time or at a later date.

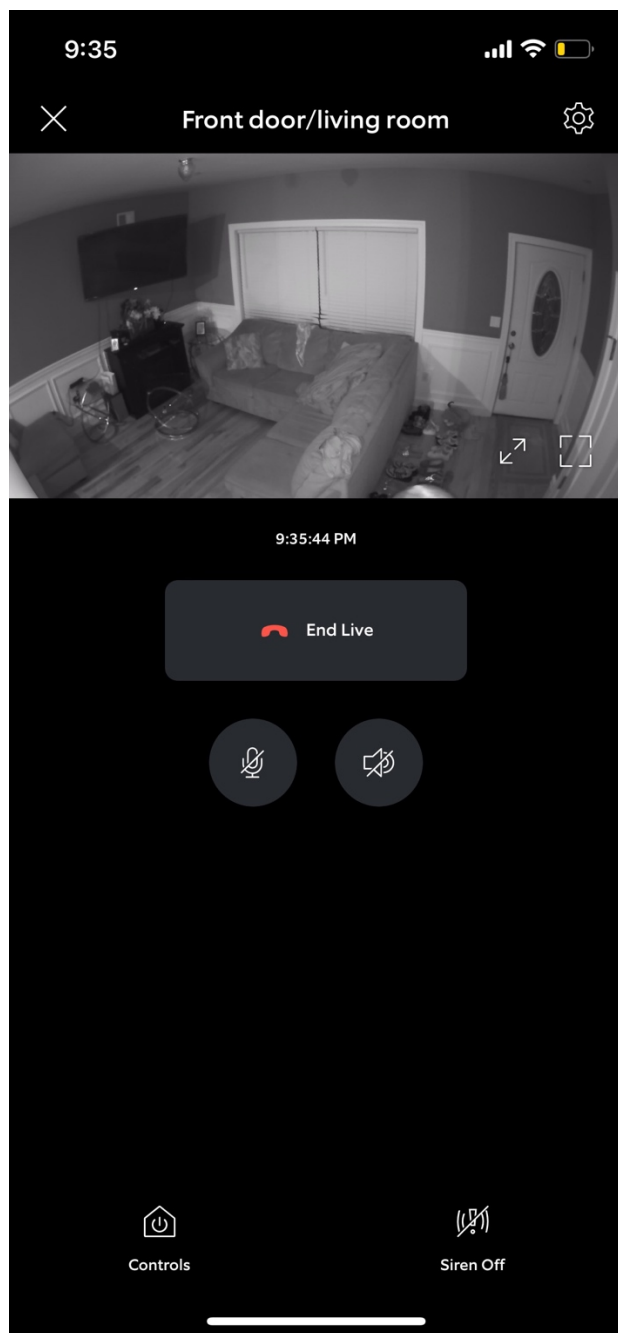
Hopeful that the Court might embrace this type of an arrangement, Ms. Hunter and several other members of Mr. Jackson's family have outfitted her apartment with video surveillance cameras. At my request, each camera's location and the image it captures is set forth below; and, on the theory that a picture is worth 1,000 words, I present the follow for the Court's review:²

¹ At our conference last Friday, counsel had proposed a mechanism that would block all Wifi signals to Ms. Hunter's residence, which is where Mr. Jackson would reside, were he to be released. Unfortunately, while this is technologically possible, it proved not to be feasible given that Ms. Hunter resides in an apartment building and the device would block considerably more than simply the signal in her apartment.

² My apologies up front because my "techie" skills leave much to be desired.



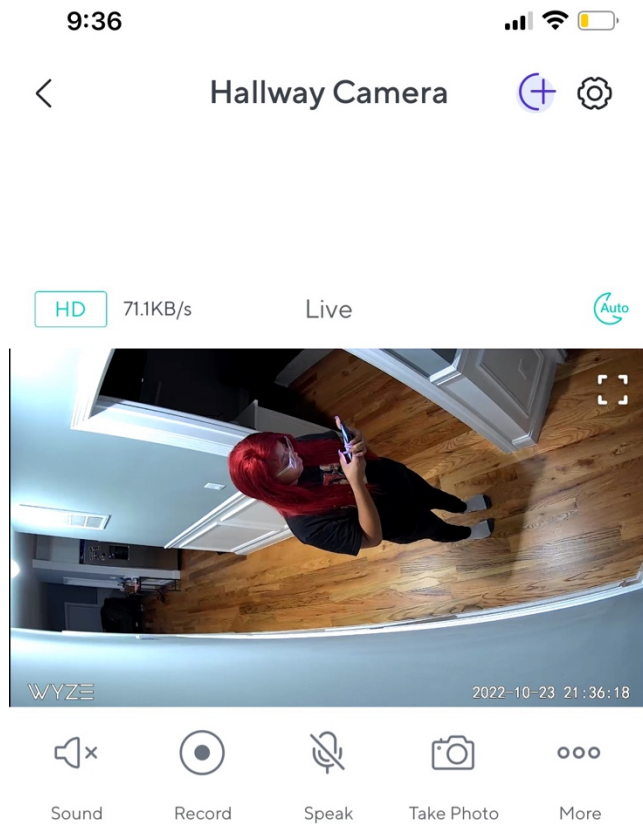
This camera faces the entrance to the front door of the apartment and will capture the images of everyone who enters the apartment.



This camera is also aimed at the front door but also has a full view of the living room area.



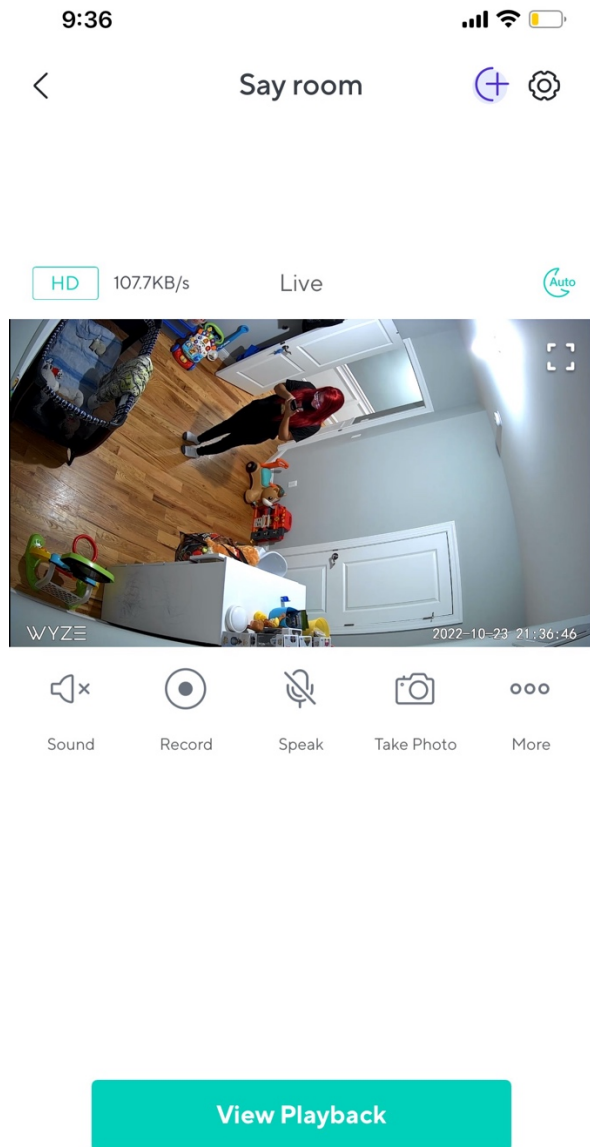
This camera is aimed at the passageway from the living room to the rest of the apartment.



This camera is aimed at the hallway between the rooms. Ms. Hunter is walking in the hallway space so that your Honor can see firsthand how the images will appear when anyone is walking in that hallway.



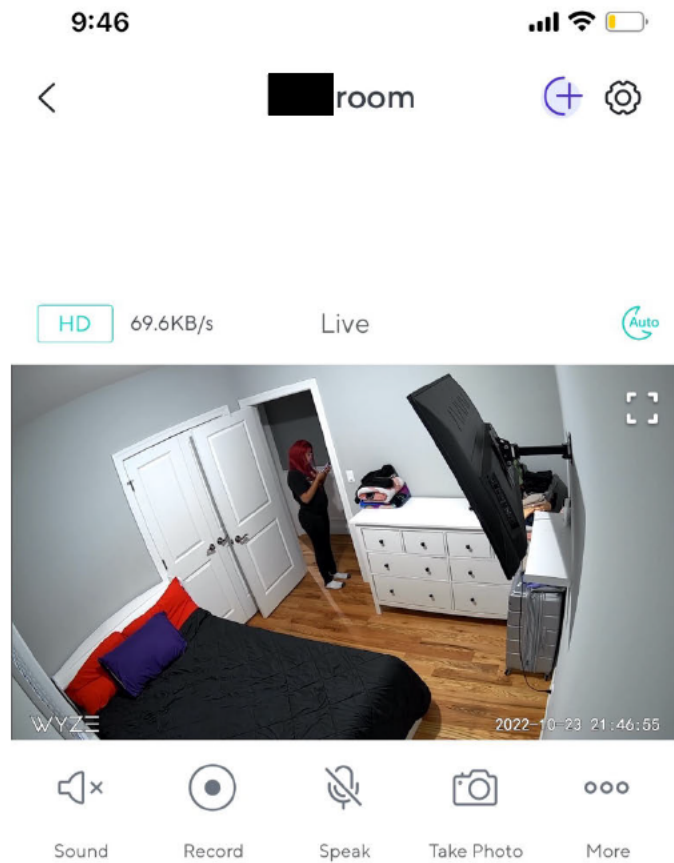
The camera in this photo is aimed at the couple's young son's bedroom.



This image reflects the view from inside their son's bedroom. Again, Ms. Hunter is pictured in the field so that your Honor can see the quality of the image that will be captured by these cameras.



This camera is facing Mr. Jackson's daughter's bedroom.

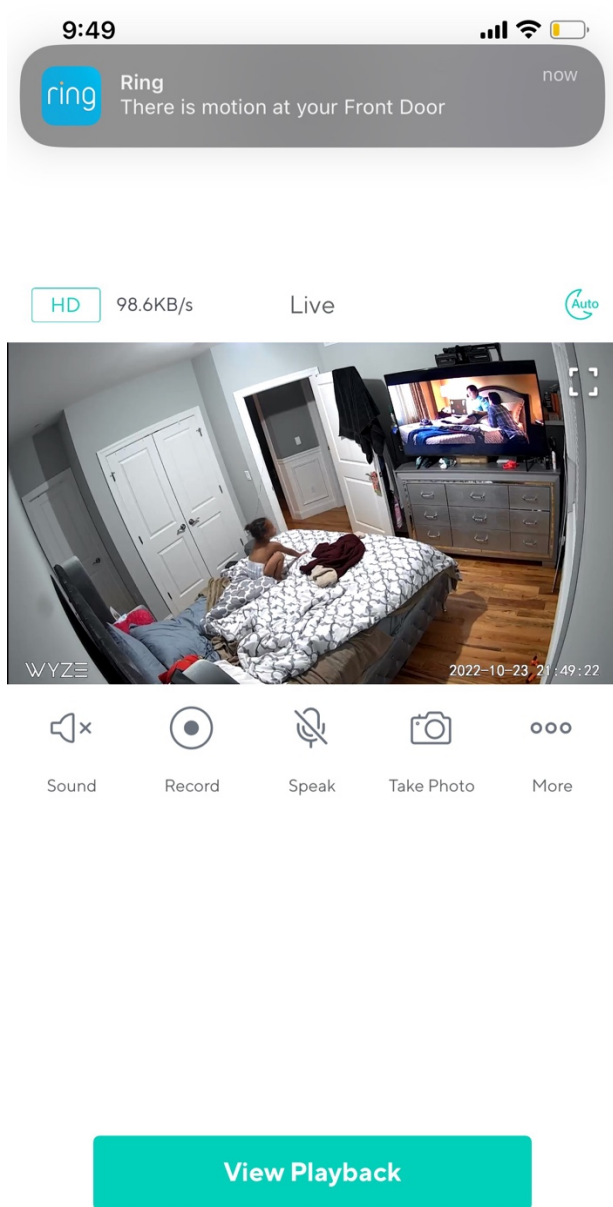


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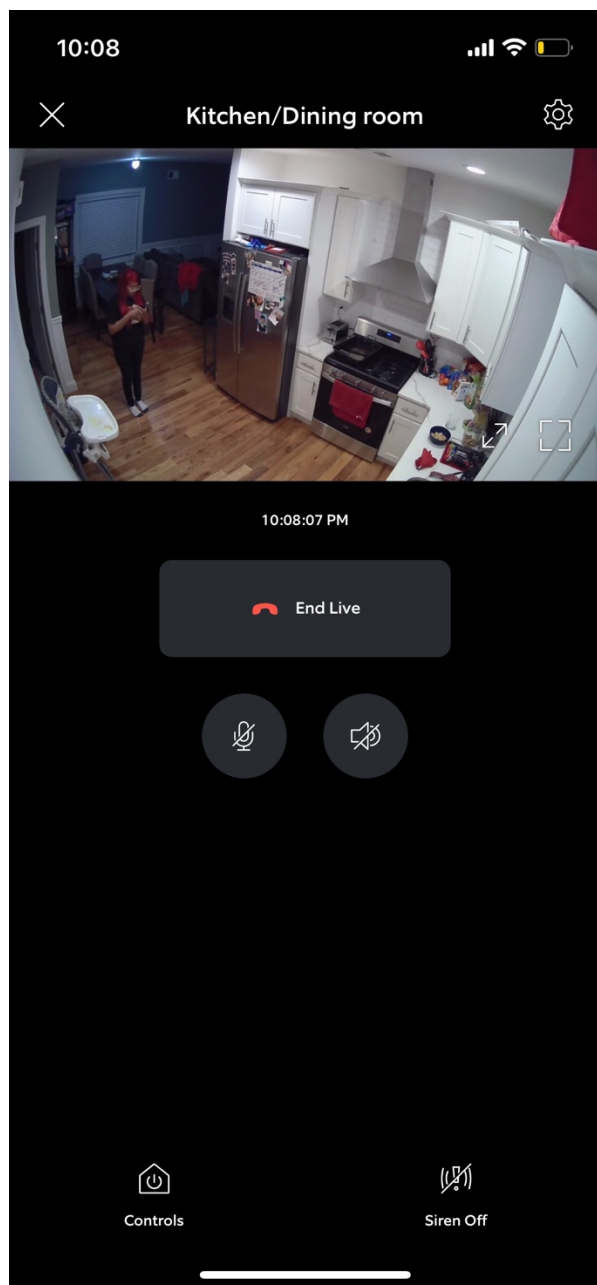
This is the actual image that the camera is capturing; and, Ms. Hunter's image is captured her to provide the Court with a full view of the area that will be surveilled by this camera.



This camera one facing Ms. Hunter's bedroom



This is the image that this camera is capturing.



This is the view from the camera of the image captured by camera installed in the kitchen.

I hope that these images give your Honor a sense of the level of surveillance that the recently installed cameras will capture in the apartment where Mr. Jackson would be residing were the Court to release him on bond. Additionally, it is my hope that the vigor and intensity with which Mr. Jackson's family embraced the opportunity to provide such an advanced system of surveillance on such short notice should speak volumes about how seriously they are taking the concerns voiced by the Court at Friday's bail hearing.

The Court's time and attention to the critical question of releasing Mr. Jackson on bail is very much appreciated.

Respectfully submitted,

Susan G. Kellman

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cc: All Counsel

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